



I. Introduction

On April 8, 1993, the Commission released a Notice of Proposed Rulemaking (Notice) on metric conversion which proposed amending Part 61 of the rules by adding § 61.37, Use of Metric Measurement. The Commission stated that this metric conversion would advance the intent of Congress in establishing the national metric policy.<sup>3</sup> In the Notice, the Commission advanced three options from which carriers could choose to fulfill the Commission's requirement to express measurement-sensitive information in tariff publications in metric units. Under the first option, carriers would provide a table for converting non-metric units and corresponding rates to metric units in the general rules section of the tariff publication. Under the second option, carriers would state in the applicable rate section of the tariff publication and supporting information the metric unit and corresponding rate in parenthesis beside the non-metric unit and rate. The third option provides that carriers clearly show only the metric unit and rate in the applicable rate section of the tariff publication and supporting information. In addition, carriers would provide in their tariff the conversion tables used for converting the non-metric units and corresponding rates into metric units and rates.<sup>4</sup>

The Commission initially proposes to have each carrier determine which option would be most appropriate for it. However, the Commission also requests comments on whether having multiple options would increase customer confusion, and what would be best on balance for the public interest.<sup>5</sup>

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<sup>3</sup> *Id.* at ¶ 5.

<sup>4</sup> *Id.* at ¶ 7.

<sup>5</sup> *Id.* at ¶ 9.

## II. Discussion

At the outset it is important to note that the Commission is not subject to the Metric Conversion Act, and thereby is not required to change its rules to use the metric system.<sup>6</sup> However, Ameritech does support the Commission's goal to comply with the Metric Conversion Act of 1975, and Congress' desire to move American business to metric measurement to preserve its international competitiveness. Ameritech recognizes the need to move to a global market economy and supports the transition to a metric unit of measurement to become integrated within that economy. Nevertheless, that goal and desire must be weighed against the potential confusion and loss of business that may occur if metric conversion is implemented too quickly in the domestic telecommunications industry. With that in mind, Ameritech supports the Commission's proposal to let carriers choose their preferred metric conversion vehicle or, alternatively, recommends that the Commission adopt option one at this time.

The implementation of the first option is the best first step in the transition to metric conversion. The first option, which requires a metric conversion table in the general tariff publication, introduces the idea of metric unit measurement to the telecommunications system and allows customers to become familiar with that form of measurement and rate structure. Thus, as customers are introduced to the metric system and become gradually more familiar with it, they become better prepared to purchase telecommunications services as well as other domestic services using the metric system. As yet none of this preparation has been done with the consumer. Currently, all domestic telecommunication services are sold using mileage-based measurements and rates. Consequently,

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<sup>6</sup> *Id.* at ¶ 1.

option one is the best alternative at this time because it provides an introduction to the use of metric units and allows future transition to the use of metric units should such additional conversion be deemed in the public interest.

Ameritech does not support the Commission prescribing the use of option two or three because they both contemplate an almost full scale conversion to the use of the metric system.<sup>7</sup> While option two and option three appear superficially to require only that Ameritech list the metric rate and unit in the tariff next to the usual rate and tariff, by requiring Ameritech to list the metric measurements and rates on the specific tariff pages, those options essentially require Ameritech to provide its services under the metric system. Thus, Ameritech legally would be required to change its measurement of all its mileage sensitive rates to meter-sensitive rates, and bill them in the same manner. Such a change in the provision of tariffed services would necessitate Ameritech

intraLATA interstate toll and they all have measurement-sensitive rates which require conversion to the metric system. Ameritech's customers for these services are large sophisticated businesses, small businesses and residential end users. While the sophisticated businesses would be better prepared to adjust to a metric system, if Ameritech was required to use the metric system, these customers would have to adapt some of their ordering and billing reconciliation systems to the metric system and potentially incur significant costs. Moreover, small businesses also would have to adapt their systems to the metric system but would be less able to sustain the cost and potential confusion. Finally, residential users would just be confused. Because of the cost and confusion entailed by converting to the metric system, these customers potentially would move to other service providers not subject to these rules rather than invite these problems.

Not only do option two and three create substantial confusion and the risk of loss of business, they do not provide any corresponding public interest benefits. At this time, Ameritech's services subject to these rules are sold only in the Midwest region and are not available on the international market. In fact, because of the regulatory nature of telecommunications services, these services will never be provided as currently configured in the international market. Thus, moving to the metric system would not further the legislation's goal of ensuring American business remains globally competitive. Thus, there are no benefits to adopting these options.

### III. Conclusion

Based on the foregoing, Ameritech supports the Commission's proposal to allow carriers to choose which option for metric conversion is most appropriate. Alternatively, Ameritech recommends the Commission adopt option one,

because it would further the Commission's goals while not creating significant customer confusion.

Respectfully submitted,

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